

LAW OFFICES OF
HODGE & FRANCOIS

1340 TAARNEBERG

November 4, 2011

[VIA EMAIL TO: tresmoore@aol.com]

Treston Moore, Esquire
MOORE, DODSON & RUSSELL, PC
P. O. Box 310
St. Thomas, VI 00804

Re: *Jeffrey Epstein and L.S.J., LLC vs. Fancelli Paneling, Inc.*
Superior Court Case No. ST-10-CV-443

Dear Treston:

As required by LRCi 37.1, I am writing to request that we meet and confer regarding Fancelli Paneling, Inc.'s ("Fancelli") failure to provide Rule 26(a)(1) disclosures by October 15, 2011 and its failure to respond to Plaintiffs' interrogatories and requests for production which were hand delivered to your office on September 30, 2011. As of today, Fancelli's Rule 26(a)(1) disclosures are 20 days past due and its responses to discovery are also past due.

By email dated October 31, 2011 you requested an additional two weeks within which to respond to the Plaintiffs' discovery requests. In response, I requested that we talk about the Court's deadlines which required, among other things, that the parties complete all written discovery on or before November 1, 2011, and that mediation is supposed to be completed by December 1, 2011. You replied that you would get back to me.

I am available all afternoon until 4 p.m. on November 7 and all day on November 8, 2011 to meet and confer as required by LRCi 37.1. If neither of these dates are convenient, please suggest another date and time so that we may meet and confer by the close of business on November 9, 2011. In light of the Court's order that the parties complete mediation on or before December 1, 2011, I cannot agree to a two week extension for Fancelli to respond to outstanding discovery requests and provide its Rule 26(a)(1) disclosures.

Sincerely,



Denise Francois